



February 11, 2021

Via Electronic Mail

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Clinton A. Rosenthal
Benjamin D. Evans
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Austin, Texas 78701
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Amy L. Ruhland
DLA PIPER LLP (US)
401 Congress Avenue, Suite 2500
Austin, Texas 78701-3799
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Re: Civil Action No. 1:19-cv-00767-RP: *BalanceCXI, Inc. d/b/a Zacoustic v. International Consulting & Research Group, LLC, Christopher DeSimone and Adam Oldfield*, in the United States District Court for the Western District of Texas, Austin Division.

Dear Counsel:

Pursuant to Judge Pitman's Amended Order (Dkt. 111), and without waiving any applicable attorney-client privilege or work product, please find enclosed invoices related to attorneys' fees and costs incurred in filing and arguing the Motion to Compel (Dkt. 12) and Motion for Sanctions (Dkt. 66). Any time entry for which BalanceCXI does not seek reimbursement in connection with those motions has been redacted.

The breakdown of attorneys' fees and costs is as follows:

- Motion to Compel: \$115,995.00
- Motion for Sanctions: \$190,418.00
- Forensic Related Attorney Work: \$7,789.00
- Forensic Costs: \$23,810.00

Pursuant to Local Court Rule CV-7(j), please let us know: (1) if Defendants DeSimone and Oldfield agree to pay the above-stated fees and costs; or (2) if not, then the specific reason(s) for why Defendants do not agree.

We are available to confer at your convenience ahead of BalanceCXI's February 17, 2021 deadline to file its application for attorneys' fees and costs.

haynesboone

February 11, 2021

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Please do not hesitate to contact me to address any of these issues.

Sincerely,

A handwritten signature in blue ink, appearing to read 'A. Sencenbaugh', is positioned above the typed name.

Adam Sencenbaugh
Partner

Direct Phone: 512.867.8489
adam.sencenbaugh@haynesboone.com

4849-9465-9292

haynesboone

Invoice Number: 21409688
Invoice Date: December 27, 2019
Matter Name: BalanceCXI, Inc. v. ICAR LLC et al
Client/Matter Number: 0058532.00004
Billing Attorney: Adam H Sencenbaugh

BalanceCXI, Inc.

REDACTED

REMITTANCE PAGE

For Professional Services Through November 30, 2019

Total Fees

Total Expenses

Total Fees, Expenses and Charges

Total Invoice Balance Due

REDACTED

REDACTED

Invoice Number: 21409688
 Matter Name: BalanceCXI, Inc. v. ICAR LLC et al
 Client/Matter Number: 0058532.00004
 Billing Attorney: Adam H Sencenbaugh

December 27, 2019
 Page 2 of 3

For Professional Services Through November 30, 2019

Professional Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
REDACTED				
11/27/19	Adam H Sencenbaugh	Telephone conference with client representatives regarding Defendants' response to discovery requests; begin draft of correspondence to opposing counsel regarding deficiencies in document production and discovery responses; email correspondence with client representatives regarding case status.	3.40	\$2,465.00
11/29/19	Adam H Sencenbaugh	Analyze discovery responses from opposing counsel to draft correspondence regarding discovery deficiencies; outline legal issues relevant to discovery dispute and motion to compel.	2.80	\$2,030.00
11/30/19	Henson Adams	Draft and revise discovery deficiency letter to opposing counsel; review discovery responses regarding the same; research federal law regarding general objections. [REDUCED BY 3.0 HOURS]	3.30	\$1,633.50
11/30/19	Adam H Sencenbaugh	Revise correspondence to opposing counsel regarding discovery deficiencies and Motion to Compel; analyze legal issues relevant to discovery dispute and Motion to Compel.	3.00	\$2,175.00
Total Fees				REDACTED

Invoice Number: 21409688
Matter Name: BalanceCXI, Inc. v. ICAR LLC et al
Client/Matter Number: 0058532.00004
Billing Attorney: Adam H Sencenbaugh

December 27, 2019
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REDACTED

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Invoice Number: 21416367
Invoice Date: February 14, 2020
Matter Name: BalanceCXI, Inc. v. ICAR LLC et al
Client/Matter Number: 0058532.00004
Billing Attorney: Adam H Sencenbaugh

BalanceCXI, Inc.

REDACTED

REMITTANCE PAGE

For Professional Services Through December 31, 2019

Total Fees

Total Expenses

Total Fees, Expenses and Charges

Total Invoice Balance Due

REDACTED

REDACTED

Invoice Number: 21416367
 Matter Name: BalanceCXI, Inc. v. ICAR LLC et al
 Client/Matter Number: 0058532.00004
 Billing Attorney: Adam H Sencenbaugh

February 14, 2020
 Page 2 of 6

For Professional Services Through December 31, 2019

Professional Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
12/03/19	Henson Adams	Continue to draft and revise letter to opposing counsel regarding discovery deficiencies; review client comments to the same; review and analyze Defendants' Discovery Responses with respect to deficiencies and objections.[REDUCED BY 3.0 HOURS]	1.20	\$594.00
12/03/19	Adam H Sencenbaugh	Email correspondence with client representatives regarding case status; revise correspondence to opposing counsel regarding discovery deficiencies.	1.30	\$942.50
12/04/19	Henson Adams	Revise and finalize Discovery Deficiency Letter; review and analyze discovery responses regarding the same.	2.20	\$1,089.00
12/04/19	Adam H Sencenbaugh	Revise and transmit correspondence to opposing counsel regarding failure to respond to outstanding discovery requests.	1.80	\$1,305.00
REDACTED				
12/05/19	Henson Adams	Correspondence with client regarding Discovery Deficiency Letter; begin draft of Motion to Compel regarding discovery deficiencies by Defendants; research and analyze Federal Rules of Civil Procedure on Motions to Compel discovery and federal case law regarding the same.	4.90	\$2,425.50
REDACTED				
12/09/19	Henson Adams	Telephone call with forensic examiner to discuss the protocol for collecting electronic devices and to discuss past forensic findings and analysis for use in Motion to Compel; continue to draft Motion to Compel; analyze case documents, past correspondence with opposing counsel, and forensic reports with respect to preparation of Motion to Compel.	6.40	\$3,168.00
12/10/19	Henson Adams	Prepare template for appendix to Motion to Compel.	0.40	\$198.00
12/11/19	Henson Adams	Continue to draft Motion to Compel; analyze electronic data, past correspondence with opposing counsel, and forensic reports with respect to preparation of Motion to Compel; prepare exhibits and supporting documents for Motion to Compel, including drafting and revising declarations.	6.60	\$3,267.00
12/12/19	Henson Adams	Continue to draft and revise Motion to Compel; prepare additional exhibits for Motion to Compel.	2.50	\$1,237.50

Invoice Number: 21416367
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 Billing Attorney: Adam H Sencenbaugh

February 14, 2020
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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
12/13/19	Henson Adams	Continue to draft and revise Motion to Compel.	0.40	\$198.00
REDACTED				
12/15/19	Henson Adams	Draft and revise declaration of Tim Lavin and Adam Sencenbaugh in support of Motion to Compel; draft proposed order granting Motion to Compel; revise Motion to Compel and continue to gather and prepare exhibits regarding the same.[REDUCED BY 2.0 HOURS]	2.90	\$1,435.50
12/15/19	Adam H Sencenbaugh	Revise Motion to Compel documents and interrogatory responses from Defendants; revise Declaration of Tim Lavin in support of Motion to Compel; revise Appendix of arguments in support of Motion to Compel.	4.60	\$3,335.00
12/16/19	Henson Adams	Revise and finalize Motion to Compel; gather, prepare, and finalize exhibits to the same, including Declarations of Tim Lavin and Adam Sencenbaugh, exhibits, past correspondence with opposing counsel, forensics reports, and proposed order; discuss Motion to Compel and exhibits with client; strategize regarding presentation of Motion to Compel issues, including timeline of events, in the hearing with the Court.[REDUCED BY 2.0 HOURS]	4.30	\$2,128.50
12/16/19	Iris Gibson	Review and revise Lavin Declaration in Support of Motion to Compel.	0.90	No Charge
12/16/19	Adam H Sencenbaugh	Revise Motion to Compel discovery responses; revise Declaration of Tim Lavin in Support of Motion to Compel; revise Declaration of Adam Sencenbaugh in Support of Motion to Compel; revise Proposed Order in Support of Motion to Compel; email correspondence with client representatives regarding Motion to Compel.	5.90	\$4,277.50
12/17/19	Henson Adams	Begin to prepare reply briefing on Motion to Compel; research federal law regarding sanctions.	1.80	\$891.00
REDACTED				

Invoice Number: 21416367
 Matter Name: BalanceCXI, Inc. v. ICAR LLC et al
 Client/Matter Number: 0058532.00004
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February 14, 2020
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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
REDACTED				
12/18/19	Adam H Sencenbaugh	Email correspondence with opposing counsel regarding discovery issues relevant to case; telephone conference with client representatives regarding issues relevant to case; revise Rule 29 Device Protocol for use in case for production of hard drives and in support of Motion to Compel production of documents.	2.60	\$1,885.00
		REDACTED		
12/23/19	Henson Adams	Review and analyze Defendants' Response to Motion to Compel, including reading and analyzing case law cited in the same; continue to draft and revise BalanceCXI's Reply to the same.	3.00	\$1,485.00
12/23/19	Adam H Sencenbaugh	Analyze Response to Motion to Compel filed by opposing party in case; email correspondence and telephone conference with client representatives regarding Response to Motion to Compel and case strategy.	1.90	\$1,377.50
12/24/19	Henson Adams	Continue to review and analyze Defendants' Response to Motion to Compel; continue to draft and revise BalanceCXI's Reply to the same.	1.20	\$594.00
12/26/19	Henson Adams	Continue to review and analyze Defendants' Response to Motion to Compel; continue to draft and revise BalanceCXI's Reply to the same; gather and prepare exhibits, including declaration of Henson Adams, to support the reply.	3.60	\$1,782.00
12/26/19	Adam H Sencenbaugh	Revise Reply in Support of Motion to Compel production of documents and interrogatory responses; email correspondence with client representatives regarding Reply in Support of Motion to Compel.	3.80	\$2,755.00
12/27/19	Henson Adams	Revise and finalize draft of reply to send to client for review.	1.10	\$544.50
12/27/19	Adam H Sencenbaugh	Revise declarations and exhibits in support of Reply for Motion to Compel production of documents and interrogatory responses.	0.80	\$580.00

Invoice Number: 21416367
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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
12/30/19	Henson Adams	Revise and finalize BalanceCXI's Reply to Defendants' Response to BalanceCXI's Motion to Compel; finalize and marshal exhibits to the same; finalize Declaration of Henson Adams in support of Reply; correspondence with opposing counsel to send courtesy copy of filed Reply.	4.40	\$2,178.00
12/30/19	Adam H Sencenbaugh	Revise and file Reply in Support of Motion to Compel production of documents and interrogatory responses.	2.30	\$1,667.50

REDACTED

Total Fees

REDACT

REDACTED

Invoice Number: 21416367
Matter Name: BalanceCXI, Inc. v. ICAR LLC et al
Client/Matter Number: 0058532.00004
Billing Attorney: Adam H Sencenbaugh

February 14, 2020
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REDACTED

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Invoice Number: 21425635
Invoice Date: April 17, 2020
Matter Name: BalanceCXI, Inc. v. ICAR LLC et al
Client/Matter Number: 0058532.00004
Billing Attorney: Adam H Sencenbaugh

BalanceCXI, Inc.

REDACTED

REMITTANCE PAGE

For Professional Services Through January 31, 2020

Total Fees

Total Expenses

Total Fees, Expenses and Charges

Total Invoice Balance Due

REDACTED

REDACTED

Invoice Number: 21425635
 Matter Name: BalanceCXI, Inc. v. ICAR LLC et al
 Client/Matter Number: 0058532.00004
 Billing Attorney: Adam H Sencenbaugh

April 17, 2020
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For Professional Services Through January 31, 2020

Professional Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
01/02/20	Henson Adams	Review and prepare correspondence with opposing counsel regarding Defendants request to file a Surreply to Motion to Compel.	1.20	\$594.00
01/03/20	Henson Adams	Review opposing counsel's request to the Court for a telephonic hearing regarding Motion to Compel, including strategies for handling the request; telephone conference with client regarding Motion to Compel; begin draft response to opposing counsel's email correspondence regarding Rule 29 Stipulation and device production in reference to Motion to Compel.	1.40	\$693.00
01/03/20	Adam H Sencenbaugh	Email correspondence with opposing counsel regarding case and production of missing hard drives sought in Motion to Compel; email correspondence with client representatives regarding case; telephone conference with client representatives regarding case status and Motion to Compel.	2.00	\$1,450.00
REDACTED				
REDACTED				
REDACTED				
REDACTED				
REDACTED				
01/08/20	Adam H Sencenbaugh	Telephone conference with client representatives regarding case status and Motion to Compel; telephone conference with forensic examiner regarding missing devices relevant to Motion to Compel; prepare outline for hearing before United States Magistrate Judge in case on issues relevant to Motion to Compel; analyze documents provided by forensic examiner relevant to hard drives sought in Motion to Compel.	3.70	\$2,682.50
01/09/20	Henson Adams	Review and analyze forensic report regarding the list of devices connected to the Lexar and Western Digital devices sought in Motion to Compel; review list of files recovered from the Lexar and Western Digital devices sought in Motion to Compel; discuss the same with client; prepare for and attend telephonic hearing before the Court. [REDUCED BY 3.0 HOURS]	1.70	\$841.50

Invoice Number: 21425635
 Matter Name: BalanceCXI, Inc. v. ICAR LLC et al
 Client/Matter Number: 0058532.00004
 Billing Attorney: Adam H Sencenbaugh

April 17, 2020
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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
01/09/20	Adam H Sencenbaugh	Prepare for and participate in status conference with United States Magistrate Judge regarding case and Motion to Compel; telephone conference with client representative regarding case and Motion to Compel; analyze reports provided by forensic examiner relevant to Motion to Compel.	2.90	\$2,102.50
REDACTED				
REDACTED				
REDACTED				
REDACTED				
01/21/20	Henson Adams	Telephone call with opposing counsel to confer on motion for leave relevant to Motion to Compel; review offer proposed by opposing counsel to resolve discovery dispute in Motion to Compel; discuss settlement offer on Motion to Compel with client and revise according to the same.	1.70	\$841.50
01/21/20	Adam H Sencenbaugh	Email correspondence and telephone conference with opposing counsel regarding issues relevant to case and Motion to Compel; analyze offer from opposing counsel related to discovery dispute on Motion to Compel.	2.30	\$1,667.50
01/22/20	Henson Adams	Review Defendants' Motion to Seal, Motion for Leave to Amend Response to Motion to Compel, Motion to Exceed Page Limits, and corresponding exhibits, including the Declaration of Mr. O'Brien; discuss and strategize the same with client.	1.30	\$643.50
REDACTED				
REDACTED				
01/22/20	Adam H Sencenbaugh	Telephone conference with client representatives regarding filings by opposing party on Motion to Compel; analyze filings by opposing party related to Motion for Leave in opposition to Motion to Compel and arguments regarding discovery on Motion to Compel; outline issues relevant to response to Motion for Leave in opposition to Motion to Compel.	2.70	\$1,957.50
REDACTED				
01/24/20	Adam H Sencenbaugh	Continue draft of Response to Motion for Leave in opposition to Motion to Compel; email correspondence with client representatives regarding Response to Motion for Leave in opposition to Motion to Compel.	1.80	\$1,305.00

Invoice Number: 21425635
 Matter Name: BalanceCXI, Inc. v. ICAR LLC et al
 Client/Matter Number: 0058532.00004
 Billing Attorney: Adam H Sencenbaugh

April 17, 2020
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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
01/26/20	Henson Adams	Begin draft of Declaration in Support of Response to Motion for Leave in opposition to Motion to Compel; review documents produced by Defendants in response to Motion to Compel; begin draft of Motion for Leave to file under seal.	2.50	\$1,237.50
REDACTED				
REDACTED				
01/27/20	Adam H Sencenbaugh	Email correspondence with opposing counsel regarding Motion for Leave in opposition to Motion to Compel; revise Response to Motion for Leave in opposition to Motion to Compel; email correspondence with opposing counsel regarding issues relevant to Motion for Leave.	4.20	\$3,045.00
REDACTED				
01/28/20	Adam H Sencenbaugh	Revise and file Response to Motion for Leave in opposition to Motion to Compel; email correspondence with opposing counsel regarding issues relevant to Motion for Leave in opposition to Motion to Compel.	3.50	\$2,537.50
01/29/20	Henson Adams	Review and analyze Defendants' Amended Response to Motion to Compel; research federal law regarding arguments Defendants make in the same; begin to draft Reply to Amended Response to Motion to Compel.	4.30	\$2,128.50
REDACTED				
Total Fees				REDACTED

Invoice Number: 21425635
Matter Name: BalanceCXI, Inc. v. ICAR LLC et al
Client/Matter Number: 0058532.00004
Billing Attorney: Adam H Sencenbaugh

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REDACTED

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Invoice Number: 21424660
Invoice Date: April 13, 2020
Matter Name: BalanceCXI, Inc. v. ICAR LLC et al
Client/Matter Number: 0058532.00004
Billing Attorney: Adam H Sencenbaugh

BalanceCXI, Inc.

REDACTED

REMITTANCE PAGE

For Professional Services Through February 29, 2020

Total Fees

Total Expenses

Total Fees, Expenses and Charges

Total Invoice Balance Due

REDACTED

REDACTED

Invoice Number: 21424660
 Matter Name: BalanceCXI, Inc. v. ICAR LLC et al
 Client/Matter Number: 0058532.00004
 Billing Attorney: Adam H Sencenbaugh

April 13, 2020
 Page 2 of 7

For Professional Services Through February 29, 2020

Professional Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
REDACTED				
REDACTED				
02/03/20	Henson Adams	Draft Plaintiff's Reply to Defendants' Amended Response to Motion to Compel; review and analyze Amended Response to Motion to Compel with respect to the same; research federal law regarding issues relevant to Motion to Compel.	8.70	\$4,306.50
02/03/20	Adam H Sencenbaugh	Telephone conference with opposing counsel regarding outstanding discovery due from Defendants and Motion to Compel; email correspondence with client representatives regarding case status and Motion to Compel.	1.50	\$1,087.50
REDACTED				
02/04/20	Henson Adams	Draft and revise Plaintiff's Reply to Defendants' Amended Response to Motion to Compel; draft and revise Appendix in support of the same.	7.40	\$3,663.00
02/04/20	Adam H Sencenbaugh	Outline issues and revise arguments relevant to Reply to Amended Response to Motion to Compel.	1.90	\$1,377.50
02/05/20	Henson Adams	Continue to draft and revise Reply to Defendants' Amended Response to Motion to Compel; draft motion for leave to exceed page limits with respect to the same; continue to draft and revise appendix in support of the Reply in support of Motion to Compel.	3.60	\$1,782.00
REDACTED				
02/05/20	Chrissy Long	Review and analyze Federal Rule of Civil Procedure 37(e) regarding spoliation of electronically stored information, 2015 amendments, and case law interpreting same, and compile findings into spoliation memo.	3.00	\$1,485.00

Invoice Number: 21424660
 Matter Name: BalanceCXI, Inc. v. ICAR LLC et al
 Client/Matter Number: 0058532.00004
 Billing Attorney: Adam H Sencenbaugh

April 13, 2020
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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
REDACTED				
REDACTED				
02/06/20	Henson Adams	Review, revise, and finalize Reply to Defendants' Amended Response to Motion to Compel, Motion for Leave to Exceed Page Limits, and proposed order regarding the same.	1.90	\$940.50
02/06/20	Chrissy Long	Review and analyze federal case law regarding duty of preservation and the standard for reasonable steps at preservation and revise spoliation memo regarding same.	3.30	\$1,633.50
02/06/20	Adam H Sencenbaugh	Revise Reply to Amended Response to Motion to Compel, including exhibits and argument in support of Reply to Amended Response to Motion to Compel.	4.50	\$3,262.50
02/07/20	Chrissy Long	Review and analyze federal case law regarding culpability standards for spoliation and corresponding sanctions, and revise spoliation memo regarding same.[REDUCED BY 3.0HOURS]	1.80	\$891.00
02/10/20	Chrissy Long	Review and analyze relevant law regarding a plaintiff's spoliation and revise spoliation memo regarding same.	1.80	\$891.00
REDACTED				
REDACTED				
02/11/20	Henson Adams	Telephone call with witness regarding forensic analysis of electronic devices.	1.00	\$495.00
02/11/20	Chrissy Long	Review and analyze case law regarding culpability standards for spoliation and available remedies, and revise spoliation memo regarding same.	5.30	\$2,623.50
02/11/20	Adam H Sencenbaugh	Analyze issues relevant to expert witness for use in case; telephone conference with expert witness to discuss issues relevant to case.	2.30	\$1,667.50
02/14/20	Henson Adams	Review and analyze Defendants' Motion for Leave to File Surreply in opposition to Motion to Compel and Defendants' Surreply to BalanceCXI Reply in opposition to Motion to Compel; discuss and strategize response.	1.80	\$891.00
02/14/20	Adam H Sencenbaugh	Telephone conference with client representatives regarding case status and outstanding discovery issues relevant to Motion to Compel.	0.90	\$652.50

Invoice Number: 21424660
 Matter Name: BalanceCXI, Inc. v. ICAR LLC et al
 Client/Matter Number: 0058532.00004
 Billing Attorney: Adam H Sencenbaugh

April 13, 2020
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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
02/15/20	Henson Adams	Draft and revise response to Defendants' Motion for Leave to File Surreply in opposition to Motion to Compel; review and analyze case law cited in Defendants' Surreply in opposition to Motion to Compel; research federal law regarding electronic service issue relevant to Motion to Compel and Defendants' Surreply.	3.60	\$1,782.00
02/15/20	Adam H Sencenbaugh	Analyze Motion for Leave to File Surreply in opposition to Motion to Compel filed by Defendants; continue draft of Plaintiff's Response to Motion for Leave to File Surreply in opposition to Motion to Compel.	1.70	\$1,232.50
02/17/20	Henson Adams	Revise Plaintiff's Response to Motion for Leave to File Surreply in opposition to Motion to Compel.	0.60	\$297.00
02/18/20	Henson Adams	Revise and finalize Plaintiff's Response to Motion for Leave to File Surreply in opposition to Motion to Compel.	0.60	\$297.00
REDACTED				
REDACTED				
REDACTED				
REDACTED				
02/20/20	Adam H Sencenbaugh	Analyze legal issues relevant to Reply in Support of Motion for Leave to File Surreply in opposition to Motion to Compel; revise correspondence to opposing counsel regarding missing devices under discovery protocol and Motion to Compel.	1.40	\$1,015.00
02/21/20	Henson Adams	Draft and revise letter to opposing counsel regarding Defendants' production of confidential information and additional devices identified relevant to Motion to Compel and device protocol.	1.50	\$742.50
REDACTED				
REDACTED				
REDACTED				
02/26/20	Henson Adams	Review Court order regarding hearing on Motion to Compel; discuss and strategize the same; correspondence with opposing counsel regarding conferencing over Motion to Compel issues.	2.00	\$990.00

Invoice Number: 21424660
 Matter Name: BalanceCXI, Inc. v. ICAR LLC et al
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April 13, 2020
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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
REDACTED				
REDACTED				
REDACTED				
02/27/20	Adam H Sencenbaugh	Email correspondence with opposing counsel regarding discovery issues relevant to Motion to Compel.	0.90	\$652.50
REDACTED				
REDACTED				
REDACTED				
REDACTED				
REDACTED				
REDACTED				
REDACTED				

Total Fees

REDACT

REDACTED

Invoice Number: 21424660
Matter Name: BalanceCXI, Inc. v. ICAR LLC et al
Client/Matter Number: 0058532.00004
Billing Attorney: Adam H Sencenbaugh

April 13, 2020
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REDACTED

CONFIDENTIAL

Exhibit B.5

BZAC-00002998

Invoice Number: 21424660
Matter Name: BalanceCXI, Inc. v. ICAR LLC et al
Client/Matter Number: 0058532.00004
Billing Attorney: Adam H Sencenbaugh

April 13, 2020
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Invoice Number: 21424204
Invoice Date: April 10, 2020
Matter Name: BalanceCXI, Inc. v. ICAR LLC et al
Client/Matter Number: 0058532.00004
Billing Attorney: Adam H Sencenbaugh

BalanceCXI, Inc.

REDACTED

REMITTANCE PAGE

For Professional Services Through March 31, 2020

Total Fees

Total Expenses

Total Fees, Expenses and Charges

Total Invoice Balance Due

REDACTED

REDACTED

Invoice Number: 21424204
 Matter Name: BalanceCXI, Inc. v. ICAR LLC et al
 Client/Matter Number: 0058532.00004
 Billing Attorney: Adam H Sencenbaugh

April 10, 2020
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For Professional Services Through March 31, 2020

Professional Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
REDACTED				
03/02/20	Henson Adams	Create revised appendix to Motion to Compel in preparation for conference with opposing counsel.	0.80	\$396.00
REDACTED				
REDACTED				
03/02/20	Adam H Sencenbaugh	Revise and transmit correspondence to opposing party relevant to Motion to Compel.	2.20	\$1,595.00
03/03/20	Henson Adams	Create presentation for hearing on Motion to Compel, review briefing on motion including related case law, and prepare for hearing on motion to compel. [REDUCE BY 3.0 HOURS]	2.10	\$1,039.50
03/03/20	Adam H Sencenbaugh	Prepare for and participate in conference with opposing party relevant to Motion to Compel.	1.60	\$1,160.00
03/04/20	Henson Adams	Continue to work on Power Point presentation for hearing on Motion to Compel, including review of prior communications and creation of a timeline; continue to review briefing on motion including related case law and prepare for hearing on Motion to Compel; review discovery; finalize demonstrative appendix. [REDUCE BY 4.0 HOURS]	3.10	\$1,534.50
03/04/20	Chrissy Long	Review and analyze federal rules and case law regarding the proper procedure for obtaining attorney's fees based on a Motion to Compel.	1.80	\$891.00
03/04/20	Adam H Sencenbaugh	Prepare materials for Motion to Compel hearing before United States Magistrate Judge; analyze discovery supplements provided by opposing party relevant to Motion to Compel and issues to be resolved in discovery dispute.	2.50	\$1,812.50
REDACTED				
03/05/20	Henson Adams	Prepare for and attend hearing on Motion to Compel.	4.50	\$2,227.50

Invoice Number: 21424204
 Matter Name: BalanceCXI, Inc. v. ICAR LLC et al
 Client/Matter Number: 0058532.00004
 Billing Attorney: Adam H Sencenbaugh

April 10, 2020
 Page 3 of 5

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
03/05/20	Adam H Sencenbaugh	Prepare for and participate in hearing before United States Magistrate Judge on Motion to Compel.	3.80	\$2,755.00
REDACTED				
REDACTED				
03/13/20	Adam H Sencenbaugh	Analyze Court order regarding Motion to Compel and communicate with clients regarding order on Motion to Compel; email correspondence with opposing counsel regarding devices relevant to Motion to Compel.	1.40	\$1,015.00
REDACTED				
REDACTED				
03/19/20	Henson Adams	Review declaration of Kerry O'Brien relevant to Motion to Compel.	0.40	\$198.00
REDACTED				
REDACTED				
REDACTED				
REDACTED				
03/20/20	Adam H Sencenbaugh	Analyze documents produced by opposing counsel in response to Motion to Compel; email correspondence with opposing counsel regarding outstanding discovery relevant to Motion to Compel.	1.50	\$1,087.50
03/24/20	Henson Adams	Revise response to Motion to Amend Court's order on Motion to Compel and prepare motion to amend text order; prepare exhibits to the same.	3.30	\$1,633.50
03/24/20	Adam H Sencenbaugh	Analyze Emergency Motion to Modify Judgment on Motion to Compel filed by Defendants; draft Response to Emergency Motion to Modify Judgment on Motion to Compel filed by Defendants.	3.70	\$2,682.50
03/25/20	Henson Adams	Review and analyze briefing filed by Defendants regarding a deferment of modification of Court's order and opposing counsel's withdrawal from the case; review email correspondence from opposing counsel and help prepare responses to the same; prepare new redacted versions of interrogatory responses. [REDUCE BY 2.5 HOURS]	1.00	\$495.00

Invoice Number: 21424204
 Matter Name: BalanceCXI, Inc. v. ICAR LLC et al
 Client/Matter Number: 0058532.00004
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April 10, 2020
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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
03/25/20	Adam H Sencenbaugh	Email correspondence with opposing counsel regarding discovery relevant to case; email correspondence with client representatives regarding issues relevant to Motion to Compel.	1.10	\$797.50
03/27/20	Henson Adams	Review documents and discovery produced by Defendants; communication with opposing counsel regarding the same.	1.50	\$742.50
	REDACTED			
03/27/20	Adam H Sencenbaugh	Email correspondence with opposing party regarding outstanding discovery issues; analyze revised interrogatory responses from Defendants served in response to Motion to Compel.	1.50	\$1,087.50
03/28/20	Henson Adams	Review correspondence from opposing counsel and new interrogatory and request for production responses. [REDUCE BY 1.0 HOURS]	0.50	\$247.50
03/30/20	Henson Adams	Coordinate document load and discuss metadata findings with the litigation support team; review and analyze documents produced by Defendants in response to Motion to Compel.	1.70	\$841.50
	REDACTED			
03/30/20	Adam H Sencenbaugh	Begin draft of Reply in Support of Motion to Modify/Amend Text Order relevant to Motion to Compel; email correspondence with client representatives regarding issues relevant to Motion to Compel.	2.20	\$1,595.00
03/31/20	Henson Adams	Continue to review produced documents; review litigation support team spreadsheet regarding slip sheets in Defendants' production; review and revise Reply in Support of Motion to Modify/Amend Text Order.	2.20	\$1,089.00
	REDACTED			
03/31/20	Adam H Sencenbaugh	Complete draft of Reply in Support of Motion to Modify/Amend Text Order relevant to Motion to Compel; email correspondence with client representatives regarding issues relevant to Motion to Compel.	1.80	\$1,305.00

Total Fees

REDACT

Invoice Number: 21424204
Matter Name: BalanceCXI, Inc. v. ICAR LLC et al
Client/Matter Number: 0058532.00004
Billing Attorney: Adam H Sencenbaugh

April 10, 2020
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REDACTED

CONFIDENTIAL

Exhibit B.5

BZAC-00003004

haynesboone

Invoice Number: 21428969
Invoice Date: May 14, 2020
Matter Name: BalanceCXI, Inc. v. ICAR LLC et al
Client/Matter Number: 0058532.00004
Billing Attorney: Adam H Sencenbaugh

BalanceCXI, Inc.

REDACTED

REMITTANCE PAGE

For Professional Services Through April 30, 2020

Total Fees

Total Expenses

Total Fees, Expenses and Charges

Total Invoice Balance Due

REDACTED

REDACTED

Invoice Number: 21428969
 Matter Name: BalanceCXI, Inc. v. ICAR LLC et al
 Client/Matter Number: 0058532.00004
 Billing Attorney: Adam H Sencenbaugh

May 14, 2020
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For Professional Services Through April 30, 2020

Professional Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
04/01/20	Henson Adams	Review and revise Reply in Support of Motion to Amend text order on Motion to Compel and finalize the same for filing.	1.70	\$841.50
04/01/20	Adam H Sencenbaugh	Revise and file Reply in Support of Motion to Amend Text Order regarding Motion to Compel.	1.20	\$870.00
	REDACTED			
04/03/20	Henson Adams	Review and analyze Discovery Advisory filed by Defendants regarding Motion to Compel; outline arguments for Initial Discovery Advisory regarding Motion to Compel on behalf of BalanceCXI.	1.60	\$792.00
04/03/20	Adam H Sencenbaugh	Analyze Discovery Advisory regarding Motion to Compel filed by opposing party; revise and file response to Discovery Advisory regarding Motion to Compel filed by opposing party.	1.90	\$1,377.50
04/06/20	Henson Adams	Review Court's order granting BalanceCXI's Motion for an amended text order on Motion to Compel and strategize next steps and upcoming tasks.	1.50	\$742.50
04/07/20	Henson Adams	Telephone call with new opposing counsel in case; discuss next steps regarding case strategy. [NO CHARGE]	0.70	No Charge
04/07/20	Henson Adams	Team phone call with co-counsel to discuss discovery strategy. [NO CHARGE]	0.70	No Charge
04/07/20	Iris Gibson	Analyze issues relevant to discovery and disclosure of source code.	0.50	\$350.00
04/07/20	Adam H Sencenbaugh	Telephone conference with opposing counsel regarding case issues; begin draft of Plaintiff's Advisory to Court regarding discovery compliance by Defendants on Motion to Compel.	1.90	\$1,377.50
	REDACTED			
04/08/20	Henson Adams	Continue to review documents produced by Defendants.	2.50	\$1,237.50
	REDACTED			
04/09/20	Henson Adams	Continue to review documents produced by Defendants.	1.50	\$742.50

Invoice Number: 21428969
 Matter Name: BalanceCXI, Inc. v. ICAR LLC et al
 Client/Matter Number: 0058532.00004
 Billing Attorney: Adam H Sencenbaugh

May 14, 2020
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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
REDACTED				
04/09/20	Adam H Sencenbaugh	Continue draft of Plaintiff's Advisory to Court regarding Defendants' compliance with Motion to Compel.	3.60	\$2,610.00
REDACTED				
04/10/20	Adam H Sencenbaugh	Analyze documents produced by Defendants in response to Motion to Compel; continue draft of Plaintiff's Advisory to Court regarding Defendants' compliance with Court's order on Motion to Compel.	3.30	\$2,392.50
REDACTED				
04/13/20	Henson Adams	Review revised scheduling order; continue to review documents produced by Defendants.	3.70	\$1,831.50
04/13/20	Adam H Sencenbaugh	Continue draft of Plaintiff's Advisory to Court regarding Defendants' compliance with Court's order on Motion to Compel.	3.30	\$2,392.50
04/14/20	Henson Adams	Telephone conference with forensic examiner to discuss forensic findings and review of discovery responses and Defendants' Discovery Advisory; continue to review documents and communications produced by Defendants in response to Motion to Compel. [REDUCED BY 3.0 HOURS]	5.40	\$2,673.00
REDACTED				
04/15/20	Henson Adams	Review and analyze forensic issues and underlying documents relevant to Motion to Compel; telephone conference with clients to discuss source code and other issues related to Plaintiff's Discovery Advisory on Defendants' compliance with Motion to Compel; discuss missing metadata issue with internal technical specialists and analysis of the same; continue to review documents for gathering and use as exhibits to Plaintiff's Advisory; telephone call with forensic examiner. [REDUCED BY 3.0 HOURS]	6.00	\$2,970.00
REDACTED				

Invoice Number: 21428969
 Matter Name: BalanceCXI, Inc. v. ICAR LLC et al
 Client/Matter Number: 0058532.00004
 Billing Attorney: Adam H Sencenbaugh

May 14, 2020
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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
04/15/20	Adam H Sencenbaugh	Telephone conference with client representatives regarding forensic issues relevant to case; continue draft of Advisory to Court regarding Defendants' compliance with Court's Order on Motion to Compel.	3.40	\$2,465.00
04/16/20	Henson Adams	Continue to draft and revise Plaintiff's Discovery Advisory on Defendants' compliance with Motion to Compel; draft and revise declaration of Timothy Barnes for use with Plaintiff's Advisory; telephone call with clients regarding the same; gather, review, and prepare exhibits to Plaintiff's Advisory; review Defendants' Advisory and discovery responses and continue to add content to Plaintiff's Advisory related to the same.	6.00	\$2,970.00
04/16/20	Adam H Sencenbaugh	Telephone conference with client representative regarding declaration in support of Plaintiff's Advisory on Defendants' compliance with Court's order on Motion to Compel; revise declaration in support of Plaintiff's Advisory on Motion to Compel; continue draft of Plaintiff's Advisory on Defendants' compliance with the Court's order on Motion to Compel.	2.90	\$2,102.50
04/17/20	Henson Adams	Draft, revise, and finalize Plaintiff's Advisory regarding Defendants' compliance with Court's order on Motion to Compel; gather and finalize exhibits related to the same; telephone call with forensic examiner to discuss forensic issues relevant to case; draft and revise Motion to Seal related to confidential exhibits attached to Plaintiff's Advisory and proposed order. [REDUCED BY 3.0 HOURS]	2.30	\$1,138.50
04/17/20	Adam H Sencenbaugh	Telephone conference with forensic expert regarding issues relevant to missing devices ordered produced pursuant to Motion to Compel; revise and file Plaintiff's Advisory to Court regarding Defendants' compliance with Court's order on Motion to Compel.	3.80	\$2,755.00
04/20/20	Henson Adams	Review Court's order that BalanceCXI file a Motion for Sanctions for Defendants' failure to comply with Court's order on Motion to Compel; analyze federal law regarding Rule 37(b) sanctions for failure to comply with a court's discovery order.	2.60	\$1,287.00
04/20/20	Adam H Sencenbaugh	Analyze Order from United States District Court regarding Plaintiff's Advisory on Defendants' compliance with Court's order on Motion to Compel; outline issues relevant to Motion for Sanctions.	1.70	\$1,232.50
04/21/20	Henson Adams	Research federal law regarding Rule 37(b) sanctions.	2.00	\$990.00
04/21/20	Iris Gibson	Conference with co-counsel regarding Motion for Sanctions under Federal Rule 37(b); outline arguments for Motion for Rule 37(b) Discovery Sanctions; research and provide summary of discovery sanctions available under Federal Rule 37(b).	6.40	\$4,480.00
04/21/20	Adam H Sencenbaugh	Analyze issues relevant to Motion for Discovery Sanctions against Defendants; revise Motion for Discovery Sanctions against Defendants.	2.80	\$2,030.00

Invoice Number: 21428969
 Matter Name: BalanceCXI, Inc. v. ICAR LLC et al
 Client/Matter Number: 0058532.00004
 Billing Attorney: Adam H Sencenbaugh

May 14, 2020
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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
04/22/20	Henson Adams	Telephone call with co-counsel to discuss the Motion for Rule 37(b) Discovery Sanctions; research federal law related to Rule 37(b) discovery sanctions; telephone call with client regarding Motion for Rule 37(b) Discovery Sanctions; draft, revise, and finalize Motion for Rule 37(b) Discovery Sanctions. [REDUCED BY 4.0 HOURS]	5.20	\$2,574.00
04/22/20	Iris Gibson	Conference with co-counsel regarding Motion for Rule 37(b) Discovery Sanctions; research standard for adverse instructions for spoliation as discovery sanction; revise draft of Motion for Rule 37(b) Discovery Sanctions. [REDUCED BY 1.5 HOURS]	2.60	\$1,820.00
04/22/20	Adam H Sencenbaugh	Revise and file Motion for Rule 37(b) Discovery Sanctions against Defendants; email correspondence and telephone conference with client representatives regarding Motion for Rule 37(b) Discovery Sanctions.	6.50	\$4,712.50
REDACTED				
04/23/20	Adam H Sencenbaugh	Email correspondence and telephone conference with opposing party regarding issues relevant to Motion for Rule 37(b) Discovery Sanctions.	1.30	\$942.50
REDACTED				
04/24/20	Adam H Sencenbaugh	Analyze issues relevant to Motion for Rule 37(b) Discovery Sanctions reply brief; email correspondence with opposing party regarding discovery offer and response to Motion for Rule 37(b) Discovery Sanctions.	1.90	\$1,377.50
04/25/20	Henson Adams	Review documents produced by Defendants for missing metadata; discuss the same and correspondence with opposing counsel regarding missing metadata.	1.30	\$643.50
REDACTED				
04/27/20	Adam H Sencenbaugh	Analyze documents for production in case; email correspondence with opposing party regarding Motion for Rule 37(b) Discovery Sanctions and issues relevant to Motion to Compel.	2.30	\$1,667.50
04/28/20	Henson Adams	Telephone call with co-counsel to discuss response to opposing counsel's correspondence. [NO CHARGE]	0.30	No Charge

Invoice Number: 21428969
 Matter Name: BalanceCXI, Inc. v. ICAR LLC et al
 Client/Matter Number: 0058532.00004
 Billing Attorney: Adam H Sencenbaugh

May 14, 2020
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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
04/29/20	Henson Adams	Review and analyze Defendants' Response to BalanceCXI Motion for Rule 37(b) Sanctions and exhibits to the same; review case law related to issues raised in Response.	3.40	\$1,683.00
04/29/20	Iris Gibson	Review Response to Motion for Sanctions and attachments thereto; begin outline of arguments for Reply. [NO CHARGE]	0.80	No Charge
04/29/20	Adam H Sencenbaugh	Analyze Response in Opposition to Motion for Sanctions under Rule 37(b); begin draft of Reply in Support of Motion for Rule 37(b) Discovery Sanctions.	3.80	\$2,755.00
04/30/20	Henson Adams	Review draft discovery requests; telephone call with clients to discuss the same and the reply to Defendants' Response to BalanceCXI's Motion for Rule 37(b) Discovery Sanctions; review Defendants' Response and outline arguments for reply in support of BalanceCXI's Motion for Rule 37(b) Discovery Sanctions. [REDUCED BY 3.5 HOURS]	3.80	\$1,881.00
04/30/20	Adam H Sencenbaugh	Telephone conference with client representatives regarding Motion for Rule 37(b) Discovery Sanctions; continue revisions to Reply in Support of Motion for Rule 37(b) Discovery Sanctions.	2.60	\$1,885.00

Total Fees

REDACT

REDACTED

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Exhibit B.5

BZAC-00003010

haynesboone

Invoice Number: 21435038
Invoice Date: June 29, 2020
Matter Name: BalanceCXI, Inc. v. ICAR LLC et al
Client/Matter Number: 0058532.00004
Billing Attorney: Adam H Sencenbaugh

BalanceCXI, Inc.

REDACTED

REMITTANCE PAGE

For Professional Services Through May 31, 2020

Total Fees

Total Expenses

Total Fees, Expenses and Charges

Total Invoice Balance Due

REDACTED

REDACTED

Invoice Number: 21435038
 Matter Name: BalanceCXI, Inc. v. ICAR LLC et al
 Client/Matter Number: 0058532.00004
 Billing Attorney: Adam H Sencenbaugh

June 29, 2020
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For Professional Services Through May 31, 2020

Professional Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
05/01/20	Henson Adams	Continue to review and analyze Defendants' Response to Motion for Rule 37 Sanctions for failure to follow Court's order on Motion to Compel; draft and revise Reply to the same; review related evidence for use in Reply in support of Motion for Sanctions.	4.60	\$2,277.00
05/01/20	Adam H Sencenbaugh	Revise Reply in Support of Motion for Rule 37 Sanctions related to Motion to Compel.	2.40	\$1,740.00
05/02/20	Henson Adams	Discuss Reply in Support of Motion for Sanctions with co-counsel.	0.50	No Charge
05/03/20	Henson Adams	Begin draft of Reply in Support of Motion for Rule 37 Sanctions for Defendants' failure to follow Court's order on Motion to Compel; review and gather evidence related to the same.	2.00	\$990.00
REDACTED				
05/04/20	Henson Adams	Revise Reply in Support of Motion for Rule 37 Sanctions for Defendants' failure to follow Court's order on Motion to Compel; continue to review and analyze documents and other evidence related to the same.	4.50	\$2,227.50
05/04/20	Iris Gibson	Review draft Reply to Response to Motion for Rule 37 Sanctions and provide comments to same.	0.30	No Charge
05/04/20	Adam H Sencenbaugh	Revise Reply in Support of Rule 37 Sanctions related to Defendants' failure to follow Court's ruling on Motion to Compel; analyze evidence in support of request for Rule 37 Sanctions.	4.20	\$3,045.00
REDACTED				
05/05/20	Henson Adams	Revise Reply in Support of Rule 37 Sanctions related to Defendants' failure to follow Court's ruling on Motion to Compel and exhibits to the same. [REDUCED BY 2.0 HOURS]	1.60	\$792.00
05/05/20	Henson Adams	Discuss case strategy and response to opposing counsel with co-counsel.	0.80	No Charge
05/05/20	Adam H Sencenbaugh	Revise and file Reply in Support of Rule 37 Sanctions related to Defendants' failure to follow Court's ruling on Motion to Compel; email correspondence with opposing counsel regarding discovery issues relevant to case.	3.80	\$2,755.00

Invoice Number: 21435038
Matter Name: BalanceCXI, Inc. v. ICAR LLC et al
Client/Matter Number: 0058532.00004
Billing Attorney: Adam H Sencenbaugh

June 29, 2020
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Invoice Number: 21435038
 Matter Name: BalanceCXI, Inc. v. ICAR LLC et al
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 Billing Attorney: Adam H Sencenbaugh

June 29, 2020
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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
REDACTED				
05/18/20	Iris Gibson	Review issues relevant to attorney-client privilege in context of claims of spoliation and summarize potential waiver arguments relating to privilege.	0.70	\$490.00
05/18/20	Iris Gibson	Conference regarding Order setting hearing on Motion for Sanctions and discuss strategy regarding depositions and preparation for hearing; review burden of proof for sanctions under Rule 37 and prepare summary of elements based on different relief sought.	1.10	\$770.00
REDACTED				
05/20/20	Henson Adams	Continue to review documents produced by Defendants; preparation and research for virtual depositions and hearings; draft and revise notices of depositions for Defendant Adam Oldfield and Defendant Chris DeSimone.	5.30	\$2,623.50
REDACTED				
05/21/20	Henson Adams	Continue to review document productions and gather evidence for depositions and hearings; telephone call with forensic examiner to discuss collection of imaged devices files; telephone call with client and witness to discuss potential testimony at June 3 hearing; begin creating hearing demonstratives.	4.10	\$2,029.50

Invoice Number: 21435038
 Matter Name: BalanceCXI, Inc. v. ICAR LLC et al
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 Billing Attorney: Adam H Sencenbaugh

June 29, 2020
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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
05/22/20	Henson Adams	Continue to review produced documents and use the same to create deposition and hearing exhibits; review letter from opposing counsel regarding document production and metadata; telephone conference with opposing counsel regarding document production, deposition logistics, and hearing logistics; revise and finalize deposition notices for Defendant Adam Oldfield and Defendant Chris DeSimone.	6.50	\$3,217.50
REDACTED				
05/24/20	Henson Adams	Continue to gather exhibits and evidence with respect to depositions and hearing. [REDUCED BY 2.0 HOURS]	4.80	\$2,376.00
05/25/20	Henson Adams	Continue to review and analyze documents in preparation for hearing and deposition of Defendants. [REDUCED BY 3.0 HOURS]	5.80	\$2,871.00
REDACTED				
05/27/20	Henson Adams	Continue to review evidence and prepare exhibits for depositions and hearing; coordinate virtual depositions with Veritext; telephone calls with clients to discuss depositions and email received from Mr. Alvandi and production of declarations by Defendants; telephone call with forensic expert to discuss hearing and prepare for the same.	7.80	\$3,861.00
REDACTED				
05/28/20	Henson Adams	Prepare for and attend deposition of Defendant Adam Oldfield; strategize and begin preparation for Defendant Christopher DeSimone's deposition and direct examination of Roy Rector. [REDUCED BY 9.0 HOURS].	3.40	\$1,683.00
05/28/20	Iris Gibson	Research no-contact ethics rule under American Bar Association Model Rule and Texas Disciplinary Rule; consider what BalanceCXI employees are covered under no-contact rules; determine appropriate remedies for violation of no-contact rule; prepare summary of research for use in upcoming hearing.	4.20	\$2,940.00

Invoice Number: 21435038
 Matter Name: BalanceCXI, Inc. v. ICAR LLC et al
 Client/Matter Number: 0058532.00004
 Billing Attorney: Adam H Sencenbaugh

June 29, 2020
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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
REDACTED				
05/30/20	Henson Adams	Continue to review exhibits and prepare deposition outline for Defendant Chris DeSimone; review documents related to Mr. DeSimone; prepare for hearing; draft letter related to metadata and issue regarding Defendants contacting current BalanceCXI employees. [REDUCED BY 3.0 HOURS]	9.70	\$4,801.50
05/30/20	Iris Gibson	Review deposition transcript of Defendant Adam Oldfield; designate, categorize, and summarize potential impeachment testimony for use in hearing.	2.20	\$1,540.00
05/31/20	Henson Adams	Continue to prepare outline and exhibits for deposition of Chris DeSimone and documents related to the same; work on hearing presentation; work on direct of Roy Rector; review deposition designations and deposition transcript of Defendant Adam Oldfield; continue to prepare for hearing. [REDUCED BY 3.0 HOURS]	9.50	\$4,702.50
05/31/20	Iris Gibson	Continue review of deposition transcript of Defendant Adam Oldfield and exhibits thereto; designate, categorize, and summarize potential impeachment testimony; prepare chart of designations for use in hearing in case.	4.50	\$3,150.00
05/31/20	Chrissy Long	Review federal cases regarding spoliation for use in hearing under Federal Rule of Civil Procedure 37.	0.90	\$445.50

Total Fees

REDACTED

REDACTED

Invoice Number: 21435038
Matter Name: BalanceCXI, Inc. v. ICAR LLC et al
Client/Matter Number: 0058532.00004
Billing Attorney: Adam H Sencenbaugh

June 29, 2020
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haynesboone

Invoice Number: 21437738
Invoice Date: July 16, 2020
Matter Name: BalanceCXI, Inc. v. ICAR LLC et al
Client/Matter Number: 0058532.00004
Billing Attorney: Adam H Sencenbaugh

BalanceCXI, Inc.

REDACTED

REMITTANCE PAGE

For Professional Services Through June 30, 2020

Total Fees

REDACTED

Total Expenses

Total Fees, Expenses and Charges

Total Invoice Balance Due

REDACTED

Invoice Number: 21437738
 Matter Name: BalanceCXI, Inc. v. ICAR LLC et al
 Client/Matter Number: 0058532.00004
 Billing Attorney: Adam H Sencenbaugh

July 16, 2020
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For Professional Services Through June 30, 2020

Professional Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
05/31/20	Adam H Sencenbaugh	Prepare for deposition of Defendant Chris DeSimone, including preparation of outline and deposition exhibits; prepare materials for hearing on Motion for Discovery Sanctions for Defendants' failure to follow ruling on Motion to Compel.	4.80	\$3,480.00
06/01/20	Henson Adams	Prepare for and attend the deposition of Defendant Christopher DeSimone; continue to prepare for hearing on Motion for Discovery Sanctions for Defendants' failure to follow ruling on Motion to Compel, including gathering and designating exhibits and creating demonstratives; prepare direct examination of Plaintiff expert witness Roy Rector. [REDUCED BY 9.0 HOURS]	5.30	\$2,623.50
06/01/20	Iris Gibson	Continue preparing exhibits and deposition designations for cross examination of Defendant Adam Oldfield; review and revise Defendant Adam Oldfield cross examination; prepare talking points for hearing relating to Motion for Discovery Sanctions for Defendants' failure to follow ruling on Motion to Compel; review and incorporate arguments relating to death penalty sanctions under Rule 37 (b)(2) and (e). [REDUCED BY 2.0 HOURS]	6.30	\$4,410.00
REDACTED				
06/02/20	Henson Adams	Continue to prepare for hearing on Motion for Discovery Sanctions for Defendants' failure to follow ruling on Motion to Compel; witness preparation session with expert witness Roy Rector; review and analyze depositions of Defendant Adam Oldfield and Defendant Chris DeSimone and video clips of Defendant Adam Oldfield's deposition; review and prepare direct examination of expert witness; review legal issues related to hearing; prepare PowerPoint demonstrative for hearing. [REDUCED BY 5.0 HOURS]	12.50	\$6,187.50
06/02/20	Michael Brockwell	Create video deposition database for hearing; create excerpts of video depositions to include in Motion for Discovery Sanctions for Defendants' failure to follow ruling on Motion to Compel; graphic design of presentation.	5.50	\$1,925.00

Invoice Number: 21437738
 Matter Name: BalanceCXI, Inc. v. ICAR LLC et al
 Client/Matter Number: 0058532.00004
 Billing Attorney: Adam H Sencenbaugh

July 16, 2020
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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
06/02/20	Iris Gibson	Prepare presentation slides for legal arguments in Motion for Discovery Sanctions for Defendants' failure to follow ruling on Motion to Compel; prepare talking points for hearing on Motion for Discovery Sanctions for Defendants' failure to follow ruling on Motion to Compel relating to legal arguments and the admissibility of current employees statements obtained in breach of the no-contact ethical rules; review and edit DeSimone cross examination deposition excerpts; research and draft arguments regarding the application of the Federal Rules of Evidence to sanctions hearings; review and prepare legal arguments for spoliation sanctions under Rule 37(e). [REDUCED BY 4.0 HOURS].	8.40	\$5,880.00
06/02/20	Chrissy Long	Draft talking points for evidentiary hearing regarding Defendants' failure to comply with Federal Rule of Civil Procedure 31 in obtaining Stephen Reed's and Trevor Barton's declarations. [NO CHARGE]	0.90	No Charge
06/02/20	Adam H Sencenbaugh	Analyze legal issues relevant to hearing on Motion for Discovery Sanctions for Defendants' failure to follow ruling on Motion to Compel; prepare exhibits and opening statement for use in Motion for Discovery Sanctions for Defendants' failure to follow ruling on Motion to Compel; revise cross examination outlines for use in Motion for Discovery Sanctions for Defendants' failure to follow ruling on Motion to Compel.	11.20	\$8,120.00
06/03/20	Henson Adams	Prepare for and attend evidentiary hearing on BalanceCXI's Motion for Discovery Sanctions for Defendants' failure to follow ruling on Motion to Compel; telephone calls with client related to the same. [REDUCED BY 3.0 HOURS]	10.30	\$5,098.50
06/03/20	Iris Gibson	Prepare talking points for waiver of attorney-client privilege; research and summarize relevant privilege issues.	1.20	\$840.00
06/03/20	Adam H Sencenbaugh	Prepare for and participate in hearing on Motion for Discovery Sanctions for Defendants' failure to follow ruling on Motion to Compel.	11.80	\$8,555.00
06/04/20	Henson Adams	Continue to prepare for and attend second day of evidentiary hearing on BalanceCXI's Motion for Discovery Sanctions for Defendants' failure to follow ruling on Motion to Compel; telephone calls with client related to the same.	11.00	\$5,445.00
06/04/20	Adam H Sencenbaugh	Prepare for and participate in hearing on Motion for Discovery Sanctions for Defendants' failure to follow ruling on Motion to Compel.	10.70	\$7,757.50
REDACTED				

Invoice Number: 21437738
Matter Name: BalanceCXI, Inc. v. ICAR LLC et al
Client/Matter Number: 0058532.00004
Billing Attorney: Adam H Sencenbaugh

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[illegible]

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[illegible]

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<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
REDACTED				

Total Fees

REDACTED

REDACTED

Invoice Number: 21437738
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[illegible]

The diagram consists of a horizontal line with a central point. Above the line, there are several rectangular blocks of varying sizes and positions, representing a sequence of events or data points. The blocks are arranged in a way that suggests a flow or progression from left to right.